

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Misc. No. 17-151-LPS
	)	
BOLIVARIAN REPUBLIC OF	)	
VENEZUELA,	)	
	)	
Defendant.	)	

**JOINT STATUS REPORT**

Pursuant to the Court’s direction on September 15, 2025, by and through the undersigned, Robert B. Pincus, in his capacity as Special Master for the United States District Court for the District of Delaware in the above-captioned case (the “**Special Master**”);<sup>1</sup> Weil, Gotshal & Manges LLP (“**Weil**”); Evercore Group, L.L.C. (“**Evercore**”); Gold Reserve Ltd. (“**Gold Reserve**”); and the Bolivarian Republic of Venezuela, Petróleos de Venezuela, S.A., PDV Holding, Inc., CITGO Petroleum Corp. (the “**Venezuela Parties**”) (collectively, the “**Parties**”), submit the following status report.

On September 16, 2025, both Gold Reserve and the Venezuela Parties served discovery on the Special Master and his advisors. For purposes of meeting and conferring, Gold Reserve served twenty (20) requests for documents on both Weil and Evercore; a deposition notice on the Special Master; a Rule 30(b)(6) deposition notice on Weil; and a Rule 30(b)(6) deposition notice on Evercore. The Venezuela Parties served eight (8) document requests on the Special Master, Weil, and Evercore.

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<sup>1</sup> All capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in D.I. 481 (the “**Sale Procedures Order**”) or D.I. 2123 (the “**Updated Final Recommendation**”).

After the discovery requests were transmitted, the parties met and conferred and agreed that they would benefit from speaking again after first giving the Special Master's advisors an opportunity to further consider the requests and investigate the attendant burdens of collecting and producing responsive documents.<sup>2</sup> Accordingly, the Parties agreed to (i) further meet and confer on Friday, September 19, 2025; and (ii) propose to submit another status report to the Court by close of business on Monday, September 22, 2025.

Venezuela Parties' Position: While of course the Venezuela Parties will meet and confer concerning their requests, they believe the documents should be produced and the motions briefed in time for argument to occur at the beginning of the October dates the Court has reserved, and expect to emerge from Friday's meeting with a proposal to the Court that implements that schedule. To that end, the Venezuela Parties have made their requests considerably narrower than would be appropriate absent that urgency.

The Special Master's Response to Venezuela Parties' Position: The nature and extent of the discovery requests and deposition notices served today on the Special Master and his legal and financial advisors are simply incompatible with the Venezuela Parties' stated desire for expedition and urgency. As the requests stand, it would be unreasonable and, in fact, impossible to provide responses on anything close to Venezuela's timetable.

The Parties reserve all rights, including with respect to the discovery requests.

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<sup>2</sup> As indicated on the meet and confer, Weil and Evercore have begun efforts to collect certain categories of information consistent with representations made to the Court by Mr. Barr on September 15, 2025.

Dated: September 16, 2025

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

/s/ Myron T. Steele

Myron T. Steele (#00002)

Matthew F. Davis (#4696)

Bindu A. Palapura (#5370)

Hercules Plaza, 6<sup>th</sup> Floor

1313 North Market Street

P.O. Box 951

Wilmington, DE 19801

Telephone: (302) 984-6000

Facsimile: (302) 658-1192

msteele@potteranderson.com

mdavis@potteranderson.com

bpalapura@potteranderson.com

- and -

WEIL, GOTSHAL & MANGES LLP

/s/ Jared R. Friedmann

Jared R. Friedmann (Admitted *pro hac vice*)

Matthew S. Barr (Admitted *pro hac vice*)

David Lender (Admitted *pro hac vice*)

Chase A. Bentley (Admitted *pro hac vice*)

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Jared.Friedmann@weil.com

Matt.Barr@weil.com

David.Lender@weil.com

Chase.Bentley@weil.com

*Counsel for Special Master Robert B. Pincus*

MUNGER, TOLLES & OLSON LLP

/s/ George M. Garvey  
George M. Garvey  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071  
(213) 683-9100  
George.Garvey@mto.com

*Attorney for Bolivarian Republic of Venezuela*

EIMER STAHL LLP

/s/ Nathan P. Eimer  
Nathan P. Eimer  
224 South Michigan Avenue  
Suite 1100  
Chicago, IL 60604  
(312) 660-7600  
NEimer@eimerstahl.com

*Attorney for PDV Holding, Inc. and CITGO  
Petroleum Corporation*

CURTIS, MALLET-PREVOST, COLT &  
MOSLE LLP

/s/ Juan O. Perla  
Juan O. Perla  
101 Park Avenue  
New York, NY 10178  
(212) 696-6000  
jperla@curtis.com

*Attorney for Petróleos de Venezuela, S.A.*

WOMBLE BOND DICKINSON (US) LLP

By: /s/ Kevin J. Mangan  
Kevin J. Mangan (#3810)  
Matthew P. Ward (#4471)  
Stephanie S. Riley (#5803)  
1313 N. Market St., Suite 1200  
Wilmington, DE 19801  
Telephone: 302-252-4320  
Kevin.mangan@wbd-us.com  
Matthew.ward@wbd-us.com  
Stephanie.riley@wbd-us.com

- and -

NORTON ROSE FULBRIGHT US LLP  
Matthew H. Kirtland (*pro hac vice*)  
799 9th Street NW, Suite 1000  
Washington, DC 20001  
Telephone: 202-662-0200  
Matthew.kirtland@nortonrosefulbright.com

- and -

Katherine G. Connolly (*pro hac vice*)  
One Embarcadero Center, Suite 1050  
San Francisco, CA 94111  
Telephone: 628-231-6816  
Katie.connolly@nortonrosefulbright.com

- and -

Taylor J. LeMay (*pro hac vice*)  
1550 Lamar Street, Suite 2000  
Houston, TX 77010  
Telephone: 713-651-3578  
Taylor.lemay@nortonrosefulbright.com

*Attorneys for Gold Reserve Ltd.*